

IN THE UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEBRASKA

PRO SE CIVIL COMPLAINT

Case No. _____

Dr. Barbara Brundo
9827 Bloomfield Drive
Omaha, NE 68114

Jury Trial: Undecided

-v-

Christ the King Church of Omaha
831 South 88th Street
Omaha, NE 68114
And All Other Persons and Entities,
Real Names Known or Unknown
Party by statute or precedent.

ANY FUTURE CASE PROPOSED TO BE FILED IN THIS COURT BY PLAINTIFF SHALL BE REFERRED TO THE CHIEF JUDGE, OR HIS DESIGNEE, FOR REVIEW BEFORE FILING, AND THE CLERK OF THE COURT IS DIRECTED NOT TO FILE ANY SUCH CASE UNTIL THIS REVIEW HAS BEEN COMPLETED. Honorable Richard G. Kopf, June 30th, 2009

II. STATEMENT OF JURISDICTION

 X United States or a federal official or agency is a party:

There are government agencies that the Plaintiff believes are third-party to the cases, including the Nebraska Department of Education [Education statutes], the Office of the Nebraska Attorney General [Age Discrimination statutes; conflict of interest due to NEOC legal counsel]; University of Nebraska at Omaha [Admission/enrollment process].

RECEIVED

DEC 26 2017

CLERK
U.S. DISTRICT COURT

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The employment disputes had residual effects with the Army Corp of Engineers, Nebraska Economic Development Center, City of Columbus, Platte County Nebraska, Nebraska Department of Education, Plaintiff was very involved with R & T Corporation doing business as Country Club Inn Motel, Columbus Nebraska.

In Memory of Paul A. Smith,
Laid to rest in Bellwood, NE
Born June 24, 1951 - Died May 2, 2012

This bench is placed in gratitude for Paul heroically saving the lives of Theresa and Nicholas Mrzlak, Phyllis Snell and others unknown. Paul Smith alerted them in late night darkness on March 7, 1993. Temperatures fell from 36.9° to 30.0°F, during Loup River's ice jam flooding of the Country Club Inn Motel, Highway 30 & 81, Columbus Nebraska, USA. The location is now known as 3518 South 9th Street. May this bench become a "teaching" place. Imagine water: The good, the bad and the beautiful!

Donated by Drs. Barbara and Gerald Brundo
2017

Private corporations, Department of Education at Creighton University, Creighton Preparatory High School, the Society of Jesus [Jesuits] and Bergan Alegent Mercy Care Center [1870 S 75th Street, Omaha, NE; demolished] and Sisters of Mercy of the Americas, West Midwest Community, Inc. may also be third-party. Plaintiff was involved with guardianship of elderly great aunt who resided at Mercy Care.

Methodist Hospital and Brighton Gardens also made the care of an elderly aunt difficult in her discharge after hip surgery in 2011. Suffering confusion and medication issues, she was sent from the hospital before her POA was effective, alone with wheelchair transport. Her daily costs were enlarged due to disability disputes. BlueCross/BlueShield publication "Discrimination is Against the Law"

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includes "disability." Dementia is a disability identified and clarified in *Jimmo vs. Sebelius*. Plateau and maintenance of skills are key concepts.

***Jimmo v. Sebelius* Settlement Agreement Fact Sheet**

Background:

In the case of *Jimmo v. Sebelius*, the Center for Medicare Advocacy (CMA) alleged that Medicare claims involving skilled care were being inappropriately denied by contractors based on a rule-of-thumb "Improvement Standard"—under which a claim would be summarily denied due to a beneficiary's lack of restoration potential, even though the beneficiary did in fact require a covered level of *skilled care* in order to prevent or slow further deterioration in his or her clinical condition. In the *Jimmo* lawsuit, CMS denied establishing an improper rule-of-thumb "Improvement Standard." The Court never ruled on the validity of the *Jimmo* plaintiffs' allegations.

While an expectation of improvement would be a reasonable criterion to consider when evaluating, for example, a claim in which the goal of treatment is restoring a prior capability, Medicare policy has long recognized that there may also be specific instances where no improvement is expected but skilled care is, nevertheless, required in order to prevent or slow deterioration and maintain a beneficiary at the maximum practicable level of function. For example, in the regulations at 42 CFR 409.32(c), the level of care criteria for SNF coverage specify that the "... restoration potential of a patient is not the deciding factor in determining whether skilled services are needed. Even if full recovery or medical improvement is not possible, a patient may need skilled services to prevent further deterioration or preserve current capabilities."

 X **Claim arises under the constitution, laws or treaties of the United States:** The protections for both the Plaintiff and the Defendants fall under the First and Fourteenth Amendments. Protections for individual defendants violating state and federal statutes [including false reporting] would be due process. Federal Rule of Civil Procedure 9(b) Fraud of Mistake; Condition of the Mind. [State law]

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when he learned in June 2014 of the continued case. Barbara Brundo does not recall being contacted.

USPS mail was sent [new Fremont Public School application] April 2014, to Fremont Nebraska on April 28, 2014. [Receipt]

VII. RELIEF

Based on the Supreme Court decision in Hosanna vs. EEOC, Barbara Brundo's petitions to the court were legally correct, i.e. were of merit. There were also for the public good. All court filing fees were paid by Barbara Brundo.

- 1) Return of Sanctions [exact amount to be verify \$18,056] with highest legal interest rate.

Once a decision is reached on a case-by-case basis:

- 2) Damages to be assessed by an accountant for all loss of income from Christ the King Catholic School, retirement benefits through Mutual of Omaha, punitive damages, etc.

- 3) Real Estate properties sale agreements to be null and void related to Nicholas and Theresa Mrzlak. KATHY DRESSEN threatened Barbara Brundo for alerting members of her firm of her interest in the property. The home adjacent [backyard] to Mrzlak home was of known interest for purchase also.

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Do claims about sexual misconduct or steps taken to prevent sexual misconduct in hiring applications require the court to interpret church doctrine in violation of the establishment clause and/or free exercise thereof of the First Amendment?

See *Hosanna-Tabor Evangelical Lutheran Church and School v. EEOC*: No. 10-553:

Notes: Fair Employment Practice Act, United States Constitution:

8] First Amendment — Ministerial exception

First Amendment “ministerial exception” is affirmative defense rather than jurisdictional bar, and is limited to employment discrimination suits, since issue presented by exception is whether allegations entitle plaintiff to relief, not whether court has power to hear case, and Supreme Court for now expresses no view on whether exception bars other types of suits, including actions by employees alleging breach of contract or tortious conduct by their religious employers.

X Violation of civil right: [U.S. Bill of Rights] [Civil Rights Act in 1866, 1871, 1975, 1957, 1960, 1964, 1968 and 1991] **Locke:** “*protecting economic rights against government*” Right to acquire and use property... nor be obligated to relinquish his property.... to borrow money, right to contract for real estate purchase due to denial of employment and defamation of character...Rights not specifically enumerated in the constitution: parent visitation without threat of further harassment [2010-2014]. Visitation of aunt was not possible due to threats of inference in her health care after June 30, 2016. After months, suddenly on the morning of her death, a demand for funeral information was sent by email from Guardian Sally Hytrek. [Also know as Langemeier]

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Title VII §702 addresses the protection of religious organizations in hiring, but it does not address fraud [misrepresentation of the school in hiring investigation]. Catholic schools voluntarily participate in State education activities that require certification of truth. NEOC investigations also require cooperation and truthfulness. Attorney zeal must be truthful even if it is allowable to be just short of a lie. Rights have resulting responsibilities. Does a letter of interest on real estate sent to a licensed business, require an answer? Is a defense lawyer required to tell the truth about litigation involvement? Does a lawyer as an “officer of the court” have the right to harass and state untruths about a caregiver of choice for a client? And then arrange for himself as conservator and/or guardians who pretend knowledge or neglect the client?

__X__ **Employment discrimination:** Age, religion, and retaliation discrimination are at issue in this case and in a variety of previous cases; this case discriminates based on age and retaliation; the employment application with no response is the result of earlier contract violations at Christ the King Catholic School. Contractual relationships are enforceable in civil court as a voluntary burden the Church is free to enter; the First Amendment does not defend against employment contracts. Negligent employment: hiring, supervision and retention [tort]; child sexual abuse is not rooted in religious beliefs. [Satanism]

__X__ **Diversity of citizenship (a matter between citizens of different states in which the amount in controversy exceeds \$75,000)** George Risk Industries is incorporated in Colorado; Plaintiff purchased stock from parents with the statement that the stock remains in their name as long as they live. After the death of her mother, Plaintiff chose to retain the original stock certificate as “historical” and therefore of added value. That decision was derided.

_____ Other basis for jurisdiction in federal court (explain below)

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Amount in Controversy: Accountants and jury verdict research required. Sanctions paid to Archdiocese of Omaha in the amount of \$18,056 [2010] were not repaid to Plaintiff, following the Hosanna v EEOC ruling.

III. STATEMENT OF CLAIMS

Complainant alleges that it is unlawful to retaliate against applicants or employees for filing or being a witness in an EEOC charge, complaint, investigation, or lawsuit. Sex (gender) vs. sexual harassment, retaliation discrimination (whistleblower) needs to be clearly defined and clearly understood.

The Complainant alleges that she has been denied all rights to employment repeatedly for more than a twenty (20) year period. The NEOC/EEOC participation information is provided to the hiring organizations on the Curriculum Vitae of the applicant. No employer ever asked about such. One did make an aside reference after the interview was over.

WHAT PRECIPITATED and WHEN DID THE EVENTS OCCUR?

Cause? Perhaps in 1989, a can of beer in a child's school lunch or perhaps a hiring process that was said to be stalled by "Brundo's gut feeling." The reference check proved to be problematic due to allegations of pedophilia. The initial NEOC/EEOC Complaint was filed on March 18, 1998. There are numerous charges throughout the 20+ years documented in the NEOC letter provided as an addendum.

The new Dismissal and Notice of Rights is based on the following:

A Grade 5/6 teacher position was advertised in the Omaha World Herald on Sunday, Nov. 15, 2015 and again on Thursday, Nov 26, 2015.

On November 17, 2015, Barbara Brundo sent a group email [To: KKeiser@unomaha.edu Cc: Peters, Kevin; Dee Acklie; bmraz@unomaha.edu; and segrellc@ctkomaha.org], which as listed, included Mr. Chris Segrell, Principal of Christ the King School, Omaha, NE. The intent of the message was assistance to

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update Nebraska Educators Certificate either by enrolling in university classes or employment in a school setting. Employment was the end goal with financial earnings. Successful employment would also allow Barbara Brundo to demonstrate competence in the educational setting while meeting her renewal requirement.

In the email it was noted:

Also, the *Sunday World Herald* offered a Christ the King teaching position, January 2016, however Mr. Segrell will not consider me. The grade 5/6 assignment with language arts and math is one that I had experience as a student teacher and a first year teacher in Omaha Public Schools. Mr. Segrell has usually been professional and stated that in writing that I will not be considered, but that has not always been so. Further, I believe that I would need greater than one semester of teaching full time to renew the certificate with teacher experience.

Again, a correction of a statement where needed is appreciated.

On January 8, 2017, an email was sent to Rhonda Pittman in the Omaha, NEOC office, following a telephone message about the Christ the King position. Mr. Segrell did not respond to the email, which included Nebraska Department of Education personnel, College of St. Mary and University of Nebraska at Omaha faculty and or staff.

It is a fact that on January 13, 2016, a letter sent by email attachment was addressed to Principal Mr. Chris Segrell. along with a current Curriculum Vitae. There was no response. Just as there was no response to the November email. The resume included unpaid work experience by a great aunt and on-going work by an aunt who always stated I am going to pay you. She made Barbara Brundo the beneficiary of her Estate:

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PROFESSIONAL ACTIVITIES & CONTINUING EDUCATION

November 2011 – Present

Studied and advocated as representative of elderly aunt with dementia in two care facilities, Omaha, NE

COMMUNITY ACTIVITIES

1994- 2001

Legal Guardian for Great Aunt at Mercy Care, Omaha, NE
Assigned Social Worker: Ms. Pat Flanagan

On January 18, 2016 Patrick Slattery, Superintendent of Catholic Schools was also sent an email copy of the Nov 17, 2015 communication. There was no response.

The Complainant alleges that a younger, less qualified candidate was hired.

The successful candidate, Hannah Kupka, was a recent college graduate who had not year earned her Nebraska Educators Certificate.

The Complainant alleges that her credentials are exceptional yet she has been denied all rights to employment repeatedly for more than a twenty (20) year period.

NEBRASKA EDUCATORS CERTIFICATE

At the same time Barbara Brundo continued attempting to fulfill Nebraska Department of Education Certificate renewal requirement, as the renewal date was August 31, 2016.

RENEWAL - Prior to Expiration or Less Than Five Years Expired

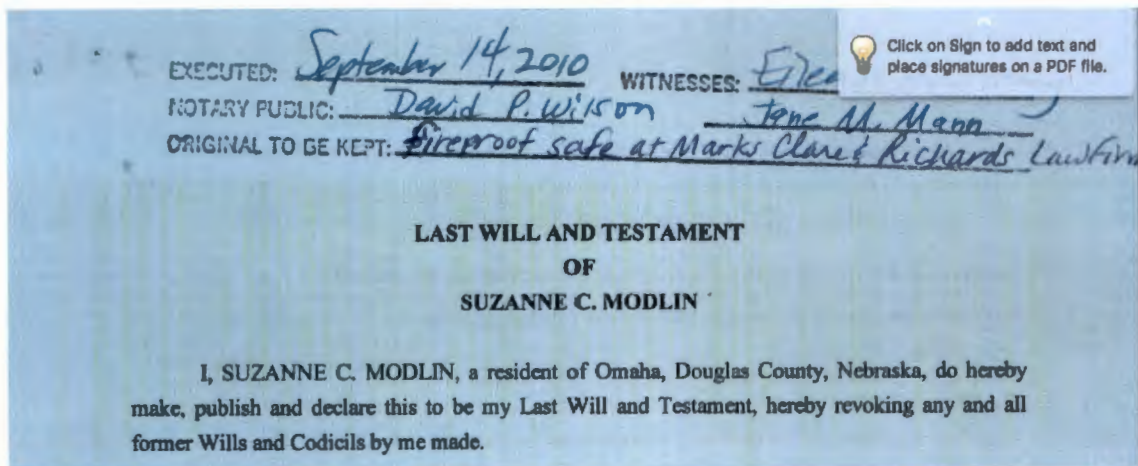
- The Application form and non-refundable application fee online at www.education.ne.gov/tcert OR Print, complete, sign and date the Application form from the

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The harassment by Mr. Wilson and unknown others continued and will be further documented as time permits.

The LAST WILL AND TESTAMENT OF SUZANNE C. MODLIN, clearly identifies Barbara Brundo repeatedly. The witness name Eileen Armstrong is covered in the illustration following. Witness Jane M. Mann was married in the last year [Sarpy County, Sept 2017 NKA Jane Sullivan [Christopher P.].



EXECUTED: September 14, 2010 WITNESSES: Eileen
NOTARY PUBLIC: David P. Wilson Jane M. Mann
ORIGINAL TO BE KEPT: Fireproof safe at Marks Clare & Richards Law Firm

**LAST WILL AND TESTAMENT
OF
SUZANNE C. MODLIN**

I, SUZANNE C. MODLIN, a resident of Omaha, Douglas County, Nebraska, do hereby make, publish and declare this to be my Last Will and Testament, hereby revoking any and all former Wills and Codicils by me made.

It is understood that by statute, a will is to be honored if there are funds available: Long Term Care Insurance, Pension, Social Security and Savings managed by Eric Butler at UBS allowed for her to live well in a facility and maintain ownership of her home. Both her daily care and the quality of her daily care were greatly reduced when Barbara Brundo was removed by Court Order of Honorable Susan Bazis.

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How can this legal representative benefit be taken from Barbara Brundo? By making allegations of theft and breaking the law and then removing her from POA, POA for Healthcare and Successor Trustee under the jurisdiction the Court using a Conservator David P. Wilson, because Suzanne C Modlin was “not dead yet.” This shocks the conscience. Hired counsel did not save the real estate from sale, but it did help get time to product documents, which were no longer of any interest yet evidenced healthcare and property care. The health care rights and home property insurance rights were of no interest to Conservator, the Catholic Church or Creighton University for that matter. Complainant alleges that Creighton University planned to use the Modlin Estate to make Barbara Brundo whole again.

August 4, 2000

NEB 2-00/01-8-29177-R;

NEB 2-00/01-8-29178-R;

32E AO 0929;

Barbara Brundo, Complainant,

Creighton University, Department of Education; Respondent.

Withdrawn August 21, 2000

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Administrative Dismissals, Oct 12, 2000 and October 20, 2000

Letter from Francisco J. Flores, JR, US EEOC, District Director, Dec 28, 2000

Meeting with John P. Schlegel, S. J. President, on or near February 23, 2001

Letter to John P. Schlegel, May 25, 2008 – No record of response.

ARTICLE V. RESIDUARY ESTATE

5.1 All of the rest, residue and remainder of my estate, real, personal or mixed, of whatever nature and wherever situated, I give and devise to BARBARA BRUNDO, of Omaha, Nebraska, or her successor, as successor Trustee under that certain Joint Grantor Trust, between ROBERT E. MODLIN and SUZANNE C. MODLIN, husband and wife, jointly referred to as "Grantor" and SUZANNE C. MODLIN, as Trustee, and known as THE ROBERT E. MODLIN AND SUZANNE C. MODLIN JOINT GRANTOR TRUST dated November 11, 1997, as amended in writing by me on November 15, 2000, and September 14, 2010, to be added to and commingled with the trust property of that trust, and held, managed and distributed by said successor Trustee in accordance with the terms and provisions of that Trust Agreement, and any subsequent amendments made to it pursuant to its terms before my death.

5.2 In the event that the foregoing devise to BARBARA BRUNDO, of Omaha, Nebraska, as successor Trustee of THE ROBERT E. MODLIN AND SUZANNE C. MODLIN JOINT GRANTOR TRUST shall fail for any reason whatsoever, then and in such event, I devise the residue of my estate to the named successor Trustee, GERALD C. BRUNDO, in the document identified as THE ROBERT E. MODLIN AND SUZANNE C. MODLIN JOINT GRANTOR TRUST dated November 11, 1997, as amended in writing by me on November 15, 2000, and September 14, 2010, in trust, to be held, managed, administered and distributed by my said successor Trustee in accordance with the terms and provisions set forth in THE ROBERT E. MODLIN AND SUZANNE C. MODLIN JOINT GRANTOR TRUST, together with any subsequent amendments made to it prior to my death, which instrument and all such amendments

Complainant alleges that she was forced to work for Mr. David P. Wilson under the

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jurisdiction of the Court. The POA of Attorney document stated that there was no accounting required of the Barbara Brundo. There was no illegal behavior on the part of the Barbara Brundo. Once accused it became imperative to document every Bank of the West, 3520 North 90th Street, Omaha NE 68134 check written and processed. Every statement from UBS Financial Services, 13815 FNB Parkway, Suite 300, Omaha, NE 68154 was presented from the time of Suzanne C Modlin's broken hip surgery [November 2011] to the date [March 2016] of the Court Order removing Barbara Brundo from financial control of Suzanne C. Modlin funds. Suzanne C. Modlin's needs were met with personal funds belonging to Barbara Brundo. [\$4000 to be itemized with check copies and process dates.]

Fortunately Judge Susan Bazis froze the UBS account on April 14, 2016; unfortunately Judge Marcena Hendrix released the account funds on July 10, 2017. The only notice of the Application for Order Releasing Restricted Accounts was to John J. Velasquez [attorney for David P. Wilson], Creighton University and Michael W. Milone, who at that time [June 12, 2017], did not represent Barbara Brundo. Mr. Michael Milone did not notify the Complainant, Barbara Brundo, his former client. He represented Complainant Barbara Brundo from **July 8, 2016** until **July 29, 2016 - 21 days**]. Mr. Michael W. Milone stated in an affidavit that he was hired in June 2016. That was not true. He told Complainant that she could correct it when he could have while in the Courtroom himself. He appeared

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and left being assured his Withdrawal was in order.

Barbara Brundo alleges that the Probate Case PR 16-213 was filed in retaliation for her previous and yet unresolved complaints with the Catholic Church, Creighton and others. While deposed regarding Suzanne C. Modlin assets, Complainant was questioned regarding Christ the King Church and School, etc. “frivolous” lawsuits. [See Depo pages 1-4 and pages 37-40 believed to be filed, DC Probate 16-213, as Confidential on or near June 2016.]

The Complainant alleges that she was denied all rights and responsibilities for the care of Suzanne C. Modlin, Douglas County Nebraska PR 16-213 in retaliation for NEOC/EEOC and Court complaints. Complainant was also denied inheritance. But more importantly, Suzanne C. Modlin was denied a Healthcare Power of Attorney and a friend, after June 2016. Kelly Henry Turner and Sally Hytrek were consulting with Margaret Mrzlak Lee Matekja, who was Interested Party by her own application. Margaret Matejka was executrix of the mother of Barbara Brundo.

The Complainant’s resume submitted for the CTK position in Jan 2016 included the care for elderly that was without compensation. Both a paternal great-aunt and paternal aunt [half sister to father] believed Barbara Brundo was going to be paid. All of the papers for both were preserved. Their homes were emptied and sold by others. Theresa Bendekovic out lived her monies, however she had VA benefits as a

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survivor of a veteran spouse that neither the social worker nor the attorney sought. Suzanne Modlin had funds projected to age 99 plus her Long Term Care benefit, Social Security and pension. Plus as a last resort her home could be rented with a monthly \$1000+ profit or she could come home with 24-hour care. She had the financial means to live. She did not believe in euthanasia. Barbara Brundo believed that Suzanne Modlin's dementia still allowed happiness and an opportunity to learn ways to help make life easier given the condition. She died neglected. And her secret was out in public documents in the court. Not even the husband of Barbara Brundo was to be told of her assets.

An unfavorable decision by Judge Susan Bazis regarding care for paternal aunt suffering from dementia interrupted the Nebraska Educator renewal application. The delay is intended until production of documents related to the Healthcare POA is complete, so as to restore the reputation of Barbara Brundo. This is not only time consuming but costly.

IV. STATEMENT OF VENUE

Christ the King School is located in Douglas County Omaha Nebraska and the injury took place in Douglas County Omaha, Nebraska, where Plaintiff continues to reside.

Corporate Accountability. Nebraska Secretary of State documents:

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The present Corporation President is Most Rev. George J. Lucas, Secretary, Rev. Damien J. Cook, Treasurer, Rev Damien J Cook, Director Milton Peterson, and Director William H Cihal, Director Archbishop George J. Lucas. The registered agent is Rev. Damien J. Cook, 654 South 86th Street, Omaha NE 68114.

Plaintiff is filing as an individual, who is a married woman with three adult children.

Defendants: Mr. Chris Segrell, Principal, Rev. Damien J. Cook Pastor; Most Rev. George Lucas, President; Christ the King Education Steering; All Other Known and Unknown Members in their individual and official capacities, who are party by statute or precedent.

This case and those previous cases thought to be “frivolous” have commonality yet there are differences between public, private and parochial educations hiring and retention of employees. While a constitutional mandate is said to trump legislative mandates, “a compelling state interest”, i.e. First Amendment does not bar action for negligent employment. *“Moreover, while the First Amendment to the United States Constitution prohibits regulation of religious beliefs, conduct by a religious entity remains subject to regulation for the protection of society.”* Kenneth R. v. Roman Catholic Diocese of Brooklyn, 229 A.D.2d 159, 654 N.Y.S.2d 791 (1997).

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VI. EXHAUSTION OF ADMINISTRATIVE PROCEDURES

Background

This case is a continuing violation by the same Defendant organization, Archdiocese of Omaha; at various times different individuals were decision makers in employment complaints. The initial complaint was filed against Christ the King Catholic School on March 18, 1998; an age discrimination charge was not permitted by the NEOC; it was learned during the investigation that the successful candidate was a woman under age forty. However, the first offer of contract was made to a man under age forty. That fact was irrelevant to the Commission, even though the Plaintiff wrote a letter to the Committee stating that her husband personally heard a conversation on the sidelines of the Pinewood Elementary School [6717 North 63rd Street, Omaha, NE] soccer field by Dave Slattery to Carl Troia, Board President, that "We need a man for this job." Search committee member Linda DeDoncker Burke McClain wrote the two letters of rejection.

The first NEOC Commission decision was "No Reasonable Cause." Attorney Bob Broom advised by letter dated October 24, 2000: "You can appeal to the EEOC but that must be done within 15 days or by October 31, 2000. However, they almost always approve the NEOC determination."... Terri Inserra, NEOC and Bob Broom, Attorney had scheduled two exit interviews, recalled as being a year apart, 1999, 2000.

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No appeal to Denver was made for the initial charge; both time constraints and the fact that there were by then, many unfair hiring decisions involving Plaintiff that would revert back to that first incident and those cases were just opened or being prepared for signing in the NEOC office.

It is recalled by Barbara Brundo that Lottie Odessa of the Denver EEOC office explained that cases are reviewed for assuring that the procedures were followed; it was understood that they do not investigate the case facts i.e. truth.

The EEOC regions changed and charges/appeals are now sent to St. Louis. The State of Nebraska was moved to the EEOC's St. Louis District Office jurisdiction in January 2006. Joseph J. Wilson, On behalf of the Commission, is stamped for James R. Neely, Jr. Director.

CHRIST THE KING Inquiry & Application 2015-2016

Plaintiff filed a Charge of Discrimination on September 8, 2016 with the Nebraska Equal Opportunity Commission, with Michelle Leo as EOC Investigator II, naming Christ the King Church, Omaha Nebraska as the employer:

RE: NEB 2-16/17-9-47803-RD
EEOC 32E-2016-00805

Brundo vs. Christ the King Church of Omaha

ANY FUTURE CASE PROPOSED TO BE FILED IN THIS COURT BY PLAINTIFF [Dr. Barbara Brundo] SHALL BE REFERRED TO THE CHIEF JUDGE, OR HIS DESIGNEE, FOR REVIEW BEFORE FILING, AND THE CLERK OF THE COURT IS DIRECTED NOT TO FILE ANY SUCH CASE UNTIL THIS REVIEW HAS BEEN COMPLETED. Honorable Richard G. Kopf, June 30th, 2009

Christ the King Church of Omaha
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After the Rebuttal Interview a great deal of background to the charge were sent to MJ Sullivan, NEOC Investigator, as many documents were not retained by the NEOC. MJ Sullivan did not recall Complainant having been previously involved in any investigations. Complainant's Witness List was included in a twenty-three [23] page document on April 17, 2017 by email communication. The USPS reported that C. King received the letter addressed to MJ Sullivan in the NEOC office on Wednesday, April 19, 2017 at 9:30 AM. A large evidence file was part of that receipt.

On May 19, 2017, the Commission Determination for the Nebraska Age Discrimination in Employment Act was made and signed [stamped] by what is believed to represent the signature of Eric Drumheller.

No Reasonable Cause – Age and Retaliation Discrimination (Hiring)

The evidence shows the Respondent received Complainant's interest in the open position after the individual was hired and had started working. The evidence fails to show an action taken was because of Complainant's age or in retaliation for having filed previous charges against Respondent.

On May 19, 2017, the Commission Determination for the Nebraska Fair

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Employment Practice Act was made using the same number as indicated on the ADEA charge, which is a procedural change from earlier investigations. The decision appears to be signed [stamped] by Stan Odenthal.

No Reasonable Cause – Retaliation Discrimination (Hiring)

The evidence shows the Respondent received Complainant's interest in the open position after the individual was hired and had started working. The evidence fails to show any action taken was in retaliation for having filed previous charges and against Respondent.

As a point, the Curriculum Vitae/Resume of the Plaintiff included the fact that Complainant has filed previous charge. Further the NEOC/EEOC activity was included. During the last 20 years, Mr. Segrell has stated that the Complainant has impressive credentials but feels her presence at Christ the King is not desirable. That fact reflects on or influences the hiring decisions of other parochial, private and public entities.

A request for Substantial Weight Review was made to Joseph Wilson, State and Local Coordination, U.S. Equal Employment Opportunity Commission, St. Louis District Office, 1222 Spruce Street, St. Louis, MO 63103 on June 1, 2017.

On June 8, 2017, Joseph J. Wilson, sent a letter acknowledging the receipt of

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Plaintiff's request: *"Your request for review was timely received. Your case will be reviewed and the Equal Employment Opportunity Commission (EEOC) will issue a written decision."*

On September 22, 2017, the U.S. Equal Employment Opportunity Commission, DISMISSAL AND NOTICE OF RIGHTS signed On behalf of the Commission by Joseph Wilson [stamp] James R. Neely, Jr. Director and received by Barbara Brundo on September 25, 2017: *"The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge."*

This document is copied to Christ the King Church of Omaha, 831 S 88th St, Omaha, NE 68114 and Patrick M. Flood, Pansing, Hogan, Ernst & Bachman, 10250 Regency Cir, Ste 300, Omaha NE 68114 formerly of Hotz, Weaver, Flood, Breitreutz, & Grant, 444 Regency Pkwy Dr. Ste 310, Omaha, NE 68114.

A copy of this Dismissal and Notice of Rights document [Exhibit 1] is attached to this pleading as well as a written answer [Exhibit 2] to the NEOC rebuttal conference. The Rebuttal Answer has been re-edited with corrections, clarifications and etc.

While this Complaint included an EEOC Notice of Rights, Section 1981 encompasses retaliation claims, as does 42 U.S.C. §1982. This overlap allows for all

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organizations that were not investigated by the NEOC/EEOC. There are no damage caps Section 1981.

In addition, copies of previous charges, intended to be all-inclusive from March 1998 through 2017, are in preparation. That fact ideally requires verification, which may or may not be provided by the Commission.

VII. TRIAL BY JUDGE

Plaintiff previously requested trial by Judge filing pro se. In conversations with various attorneys during the probate case for paternal aunt, it was stated that the only reason for this harassment is because an attorney did not represent Complainant. An attorney was hired on July 8, 2016, with the understanding that the Estate would cover the attorney fees. The attorney who made an appearance said the he would not be comfortable filing for his fees. Complainant filed for fees over \$8000. Reimbursement was denied.

It is by Court Order that the filing of any case by Barbara Brundo, Ed.D. requires permission of the Chief United States District Judge, Laurie Smith Camp and/or Richard G. Kopf, Senior United States District Judge. When a Complaint is presented for filing the usual procedure is that the Clerk prepares Service for Process i.e. the defendant is served within 120 days. There was no stipulation for

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how to proceed with the defendant when seeking permission, i.e., provide a copy to them. It has an element of ex parte, a burden to the Complainant.

When Complainant petitioned In the Supreme Court of the United States [No 13-1486), she presented the Brief at the same time to the Catholic Archdiocese and Fremont Public Schools' attorney Greg Perry of Perry, Guthery, Hasse and Gessford. Mr. Perry was later contacted to learn about his clients' position, as there was no indication of Fremont Public School as Respondent at the Supreme Court of the United States. He stated that they were not served. That is true regarding the U.S. District Court Complaint for good reason as explained above. In that instance, the Fremont Public School Complaint presented to the United States District Court, Omaha Nebraska on April 17, 2013 was returned, i.e. not accepted for filing. All the documents were prepared and ready for Service of Process, and remain so. Later a filing was made with the Eighth Circuit in St. Louis. Mr. Perry, for Fremont Public Schools, would have all filings available for Case No. 13-2205 electronically. Complainant does not use electronic filing.

Mr. Perry was served on the Petition to the United States Supreme Court on June 6, 2014 [Receipt] verified as mailed by the United States Post Office Roger Humphries. On June 17, 2014 [Receipt] mail was sent to Gregory H. Perry, 233 S 13th St. Ste 1400, Lincoln, NE 68598. [Fremont Public Schools]. While an inconvenience, now apologized for, Mr. Perry might have requested case filings

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materials and an investigation. Expiration date 8/1/2022. The Standard Elementary Teaching Credential has a "Life" term.

DATE: June 7, 2017

TO: Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento CA 95811-4213

ENCLOSURES:

Personal Check No. 4324
Email copy- Robert Martinez
Associate Governmental Program Analyst
Certification Division
Commission on Teacher Credentialing
Application Credential Authorizing Public School Service, 5 pgs.
Nebraska State Court: Investigation of Suzanne Modlin, 2 pgs.
Last Will and Testament, 5 pgs.
Curriculum Vitae of Dr. Barbara Brundo, 14 pgs.
Univ of [Nebraska] Omaha Transcript including Spring 2016, 2 pgs.

The State of California renewal application was made in 2017 and awarded after their investigation:

4. PROFESSIONAL FITNESS QUESTIONS

Answers to the following questions are required. If you answer yes to any question, you must complete the corresponding Professional Fitness Explanation Form.

Before granting your application, the Commission will review, at a minimum:

Federal Bureau of Investigation criminal history (rap sheet)
California Department of Justice criminal history (rap sheet)
International database of teacher misconduct maintained by the National Association of State Directors of Teacher Education and Certification (NASDTEC)
Previous reviews by the Commission
Complaints from others
Notifications from school districts
Teacher preparation test score violations

You must disclose misconduct, even if:

It happened a long time ago
It happened in another state, federal court, military or jurisdiction outside the United States
You did not go to court and your attorney went for you
You did not go to jail or the sentence was only a fine or probation
You received a certificate of rehabilitation
Your conviction was later dismissed (even if under Penal Code section 1203.4), expunged, set aside or the sentence was suspended

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Reciprocity requirements in the State of Nebraska were last modified in September 2017. [<https://2x9dwrlyq1he1dw6623gg411-wpengine.netdna-ssl.com/wp-content/uploads/2017/07/Reciprocity.pdf>]

DOUGLAS COUNTY NEBRASKA PROBATE COURT, JANUARY 2016

Case No. PR- 16-213: After caring for a disabled aunt who lived in care facilities after a fall Nov 2011, Complainant alleges that in 2016, she was more boldly harassed by the attorney of Suzanne C. Modlin for refusing to follow his directives, which Complainant found to be contrary to the expectations of Suzanne C. Modlin. Amendment No. 3 of the Trust/Estate of Suzanne C. Modlin was written pro se by Barbara Brundo, Ed.D. to correct inconsistencies, [i.e. reformation] allowing for all decisions to be made by Barbara Brundo, as Suzanne C. Modlin stated often, prior to her becoming incapacitated. In fact, over a period of years since 1997.

Transcribed by Complainant: January 27, 2016 12:11 PM 91 sec.

402 492 9800 *Hi, This is for Barbara Brundo. This is David Wilson from Marks, Clare, Richards. Barbara, what you done and faxed to me is against the law; it violates Nebraska statutes for POA and amounts to self-dealing and I just want to let you know and unless I hear from you by Friday you have voluntary torn this up or withdrawn this action we will file suit against you for self dealing on Suzanne's behalf which we have the right to do. We will then have you removed. You are only POA. You are not Trustee, you have no rights to trust assets and do not have the rights to change Barbara's [he means Suzanne's] estate plan, which have always been to give assets to charity. So you need to be very careful and tread lightly and o I suggest you give me a call and otherwise if we do not hear from you by Friday we will be taking specific action against you under Nebraska law in Court. Thank you.*

Transcribed by Complainant: February 3, 2016 12:37 PM 60 sec

402 492 9800 *This is David Wilson. Trying to get a hold of Barbara regarding Suzanne Modlin for some time because of documents. Responsibility as a lawyer and officer of the court. No choice but to contact Adult Protective Services. Financially exploited her by changing her estate plans. Never had you as a beneficiary want to talk about it. You will be hearing from Adult Protective*

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Supporting Forms link at www.education.ne.gov/tcert and your payment by check or money order AND

- Submit Documents Verifying Recent Employment Experience or Approved College Credit
 - Verification of Employment Experience form for one (1) year, half time (50%) or more, of administrative experience, within the immediate past five (5) years. Nebraska administrative experience is verified on the NSSRS system so you do not need to report AND
 - IF the experience was acquired in a state other than Nebraska, submit a photocopy of the VALID, REGULAR Administrative Certificate coinciding with the verified experience OR
 - OFFICIAL transcripts indicating completion of six (6) graduate semester hours in Educational Administration at an approved teacher education institution within five (5) years prior to the date of application.

The university credit hours are required for those not able to verify employment.

Complainant's registration at University of Nebraska at Omaha required permissions from various professors. Classes were closing during the process, which began in November 2015. Fortunately, sealed transcripts for all higher education institutions attended, were ordered previously to speed up the hiring process in the event of a job opportunity. These were presented to the Admissions Office to allow enrollment for two 3-hour classes permitted by advisors: TED 8050 DDDM [Data Driven Decision Making] and TED 8180 [Culturally Responsive Teaching] The classes were successfully completed May 2016 at a cost of over \$2000 plus books, supplies.

CALIFORNIA CREDENTIALS:

STANDARD ELEMENTARY TEACHING and ADMINISTRATIVE SERVICES

The California Commission was on Teacher Credentialing issued the renewal of the Clear Administrative Services Credential on August 24, 2017 after submission of

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Koch, H&W - Lt 2, Kush Subdiv. a minor Subdiv of Lts 6-8, Blk A, Indian Hills 4th Subdiv. Part of NE1/4 Sec 8-17-1E. \$90,000. Theresa A Mrziak, Trustee of the Nicholas & Theresa Mrziak 2008 Tr to Lance W Lehr - Part of Lts 7-9, SE1/4 Sec 25-17-1W. \$99,000. Michael Raymond Ksiazek, real to Michael Raymond Ksiazek	1/3 Int - Lt 5, Blk 5, I a/k/a Littys 1st Ad David City. (Tax Exem Stephen Vrbka, Properties, LLC - Int. Part of SE1/4 S \$1,110,000., \$1,130,0 Daniel & Susan Vrt Tuls Properties, LLC Int. Part of SE1/4 S (Tax Exempt).
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Lost opportunity: Old Carnegie Library.



Each incident of unfair hiring documented case by case, is to be paid as well as punitive damages. Clearly articulated and understood rights and responsibilities in hiring need to be promulgated. After identifying “red flag” words in refusals or determinations and learning about “internal” document files in the NEOC the process has the potential fairness. Why would there be destruction of documents in an unresolved case?

How to right the wrongs of the Church schools and public schools has to be resolved.
The truth is the best defense.

VIII. VERIFICATION

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Further the Appendix edited letter to M.J. Sullivan, contains important relevant information. The New York County Clerk's Office Complaint of Terence German v. Pope John Paul II, Index No.: 119296-1993 included a document signed by John P. Schlegel, contract termination of T. German.

I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery and (4) the complaint otherwise complies with the requirement of Rule 11.

I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Signed this 22 day of December 2017.

BY: Barbara Mrzlak Brundo
Barbara Mrzlak Brundo, Ed.D., Complainant [PRO SE]
9827 Bloomfield Drive
Omaha, NE 68114

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ADDENDUM

Exhibit 1: Dismissal and Notice of Rights

Exhibit 2: Answer to MJ Sullivan NEOC Interview
CTK NEB 2-16/17-9-47803-RD, 32 E-2016-00805
Red font indicates Dec. 2017 editing notes; with clarifications,
corrections, changes, verifications, etc.

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Barbara Brundo**
9827 Bloomfield Dr
Omaha, NE 68114

From: **St. Louis District Office**
1222 Spruce Street
Room 8.100
Saint Louis, MO 63103



On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

32E-2016-00805

Joseph J. Wilson,
State & Local Program Manager

(314) 539-7816

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Joseph Wilson
 James R. Neely, Jr.,
 Director

September 22, 2017

(Date Mailed)

Enclosures(s)

cc: **CHRIST THE KING CHURCH OF OMAHA**
831 S 88th St
Omaha, NE 68114

Patrick M. Flood
PANSING, HOGAN, ERNST & BACHMAN
10250 Regency Cir, Ste 300
Omaha, NE 68114



PRIVATE SUIT RIGHTS — Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA), or the Age Discrimination in Employment Act (ADEA):

PRIVATE SUIT RIGHTS — Equal Pay Act (EPA):

ATTORNEY REPRESENTATION - Title VII and the ADA:

ATTORNEY REFERRAL AND EEOC ASSISTANCE - All Statutes:

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

CHARGE OF DISCRIMINATION

AGENCY

CHARGE NUMBER

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

☒ FEPA
☒ EEOC

NEB 2-16/17-9-47803-RD
32E-2016-00805

Nebraska Equal Opportunity Commission
State or local Agency, if any

RECEIVED NEOC

SEP 08 2016

NAME (indicate Mr., Ms., Mrs.)
Dr. Barbara Brundo

HOME TELEPHONE (Include Area Code)
(402) 393-1310

STREET ADDRESS
9827 Bloomfield Dr Omaha NE 68114

CITY, STATE AND ZIP CODE

OMAHA OFFICE

DATE OF BIRTH
5/18/1946

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME
Christ the King Church of Omaha

NUMBER OF EMPLOYEES, MEMBERS
15-100 Employees

TELEPHONE (Include Area Code)
(402) 391-0977

STREET ADDRESS
831 S 88th St Omaha NE 68114

CITY, STATE AND ZIP CODE

COUNTY
Douglas

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☐ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN

☒ RETALIATION ☒ AGE ☐ DISABILITY ☐ GENETIC INFORMATION

DATE DISCRIMINATION TOOK PLACE

EARLIEST

LATEST

11/17/2015

8/8/2016

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

I. I am 70 years old (DOB 05/18/1946). I have filed past discrimination charges against the Respondent, most recently on April 23, 2012, charge number 2-11/12-4-42912-RD and 32E-2012-00404 as well as filing against other Catholic entities. I applied for employment with Respondent and was not hired because of my age, and in retaliation for filing previous charges of discrimination.

II. I believe I have been discriminated against on the bases of age and retaliation, in violation of The Age Discrimination in Employment Act of 1967, as Amended, and Sections 48-1004(1) and 48-1004(4) of the Nebraska Age Discrimination in Employment Act; and on the basis of retaliation, in violation of Title VII of the Civil Rights Act of 1964, as Amended, and Section 48-1114(2) of the Nebraska Fair Employment Practice Act, in that:

1. On November 17, 2015, I emailed Chris Segrell (age unknown) regarding my interest in an open 5th/6th grade teacher position.
2. January 13, 2016, I applied for a 5th/6th grade teacher position as advertised by the Respondent in the Omaha World Herald on November 15, 2015. I was not afforded an interview.
3. On August 8, 2016, I determined I was not hired via the Respondent's website and the Nebraska Department of Education Teacher Certification website.
4. The name of the teacher who was hired for this position, Hannah Kupka (age unknown), was posted on Respondent's website.
5. My credentials are exceptional and I am more than qualified for the position; however, Respondent hired a younger, less qualified candidate.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I swear or affirm that I have read the above and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

x Barbara Brundo, Ed. D.

State of

NE

County of

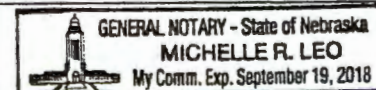
Douglas

On this, the 8th day of September, 2016
The Complainant appeared before me, known to me (or satisfactorily proven) to be the person whose name is subscribed to this instrument, and acknowledged that they executed the same for the purposes therein contained.

Notary Public

Michelle R. Lee

Notary Seal



ST. LOUIS DISTRICT OFFICE
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
ROBERT A. YOUNG BLDG., ROOM 8.100
1222 SPRUCE STREET
ST. LOUIS, MISSOURI 63103

OFFICIAL BUSINESS



Barbara Brundo
9827 Bloomfield Dr
Omaha, NE 68114

68114\$2117 C058



BARBARA MRZLAK BRUNDO, ED.D.
9827 BLOOMFIELD DRIVE
OMAHA, NE 68114
402 393 1310
FAX 402 393 5446
educatering@cox.net

April 3-17, 2017

Ms. MJ Sullivan
EOC Investigator
Nebraska Equal Opportunity Commission
1313 Farnam St., Suite 318
Omaha, NE 68102
1-800-382-7820
402-595-2751

RE: Brundo vs. Christ the King
NEB 2-16/17-9-47803-RD
EEOC 32 E-2016-00805

Dear Ms. Sullivan,

Thank you for your March 21, 2017 and April 12, 2017 letters regarding the investigation of the Christ the King Church/School NEOC complaint filed on September 8, 2016. As the earlier letter requested, we communicated by email and arranged for a rebuttal interview, which was held by telephone on March 30, 2017. That call was interrupted due to a low battery on my phone and this was so noted in a follow-up email at the end of our interview. [Enclosed] The second letter requests information in five days.

RE: Confidentiality remarks during March 30, 2017 telephone conference. My resume states the fact that I have been working toward resolution of employment disputes with the NEOC, EEOC, etc. The name of the attorney of record for Christ the King at this time is unknown.

[Insert: The name of the attorney of record is Patrick Flood, Law Office of Pansing, Hogan, Ernst and Bachman. Members of the firm include Patrick Flood, Emily Langdon Jung and Ed Hotz from the former firm representing defendants of most previous NEOC filings: Hotz, Weaver, Flood, Breitreutz & Grant, 444 Regency Parkway Drive, Suite 310, Omaha, Nebraska 68114. Member Mark J. La Puzza, of Pansing Hogan Ernst and Bachman, is a former student of Christ the King Catholic School, while plaintiff was principal. Hotz, Weaver, Flood, Breitreutz & Grant firm may still exist.

Please find copies of documents related to my allegations:

1). Papers provided to Michelle Leo at the time of the intake meeting:

A.

- Email with cover letter and resume attachments from Dr. Brundo to Principal Mr. Chris Segrell, January 13, 2016



Answer to MJ Sullivan NEOC Interview CTK NEB 2-16/17-9-47803-RD, 32 E-2016-00805

Last printed 12/21/17 3:56 PM

Page 2 of 25

- US Mail sent to Mr. Chris Segrell: Copy of email sent to Dr. Keiser UNO, Dr. Kevin Peters NDE Certification Officer, Dr. Acklie College of St. Mary, Barb Mraz UNO and Chris Segrell Christ the King, Jan 13, 2017
- US Mail sent to Mr. Chris Segrell: Cover letter of application, copy of email and first page of resume sent on January 13, 2016.
- US Mail sent to Chris Segrell with copy of January 14, 2016 at 11:23 AM going back to Oct 19, 2015, 2:09 PM email to Dee Acklie.
- Fwd: Religious Education Endorsement &/or Middle School, etc. to Rhonda Pittman, Cc: Barbara Albers, January 13, 2016. [Rhonda Claxton NKA Rhonda Pittman was involved in earlier charges.]

B.

- January 13, 2016 Letter to Chris Segrell
- Hannah Kupka Educator Certificate and Application Lookup Site
- Hannah Kupka, Special Services Coaching, 11/17/2015
- Hannah Kupka, Elementary Conditional Permit, 12/28/2015
- Hannah Kupka, Elementary, Initial, 1/6/2016
- Educator Certificate and Application Lookup Site, Julie Kaftan,
- Nebr Dept of Education, Current Personnel, School Year: 2015-2016, District: Christ the King Catholic Sch (28-0712) Julie Laughlin Kaftan was a former CU Children's Literature student of Dr. Barbara Brundo; contact 2009.]
- Barbara Brundo Educator Certificate and Application Lookup Site
- Barbara Brundo, Administrative Professional, 9/27/2006 page 1
- Barbara Brundo, Administrative Professional, 9/27/2006 page 2
- Barbara Brundo, Administrative Professional, 6/3/1998 page 1
- Barbara Brundo Administrative Professional, 6/3/1998, page 2
- Barbara Brundo, Administrative Standard, 10/25/1991, page 2
- Barbara Brundo, Administrative Standard, 10/25/1991, page 1
- Barbara Brundo, Administrative Standard, 10/25/1991, page 1 Duplicate
- Barbara Brundo, Initial [available]

C.

- Previous NEOC Complaints: March 27, 1998 that are believed to no longer exist in NEOC files due to retention policies, despite requests to preserve due to on-going litigation
- Brundo vs. Christ the King, March 18, 1998
- Brundo vs. All Saints, Aug 4, 2000
- Brundo vs. Archdiocese of Omaha – Christ the King, August 4, 2000
- Brundo vs. Christ the King, August 4, 2000
- Brundo vs. Daniel Gross High School, August 4, 2000
- Brundo vs. Our Lady of Lourdes, August 4, 2000
- Brundo vs. St. Margaret Mary, August 4, 2000
- Brundo vs. St. Matthew Catholic School, August 4, 2000
- Brundo vs. St. Robert Bellarmine School, August 4, 2000
- Brundo vs. St. Vincent de Paul, August 4, 2000
- Brundo vs. Westside Foundation, August 8, 2000
- Brundo vs. Westside Community Schools, August 4, 2000
- Brundo vs. Catholic Academy, November 17, 2000
- Brundo vs. St. Joan of Arc Catholic School, November 17, 2000
- Brundo vs. Christ the King, July 10, 2001 [modified by NEOC after Complainant signing]

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- Brundo vs. Omaha 2000 - Bright Horizons Family Solutions [modified by NEOC after Complainant signing]
- Brundo vs. Duchesne Academy, July 10, 2001
- Brundo vs. Christ the King, December 10, 2001
- Brundo vs. Christ the King Catholic School, June 14, 2002

2. Witnesses [Email correspondence, UNO course Instructors, NEOC Investigators]:

Kay Keiser, Ed.D., witness to email communications, Nov 23, 2016 [2015]
College of Education
Roskens Hall, 6001 Dodge Street
Omaha, NE 68182
Tel: 402.554.3443
Fax: 402.554.2722
kkeiser@unomaha.edu

Barb Mraz, witness to email communications, Nov 17, 2015
UNO College of Education
Roskens Hall, 6001 Dodge Street
Omaha, NE 68182
402.554.2721
bmraz@unomaha.edu

Neal Grandgenett, Ph.D., Course Instructor Spring 2016 [See #6]
Dr. George and Sally Haddix Community Chair of STEM Education
College of Education
Roskens Hall 406P
University of Nebraska at Omaha
Omaha, NE 68182
Phone 402.554-2690
ngrandgenett@unomaha.edu

Ferial Pearson, Course Instructor Spring 2016 [See #6]
Instructor
College of Education l Roskens Hall 504
University of Nebraska at Omaha
Omaha, NE 68182
402.554.3307
fpearson@unomaha.edu

Kevin Peters, Ed.D. witness to email communications Nov 17, 2015
Nebraska Department of Education
301 Centennial Mall South
PO Box 94987
Lincoln, NE 68509-4987
Phone 402 471 0739
Fax 402 742 22359
kevin.peters@nebraska.gov

Dee Acklie, Ph.D. witness to email communications, Nov 2, 2015
Director of Teacher Education and SPE
Certification Officer
College of St. Mary

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7000 Mercy Road
Omaha, NE 68106
402.399.2606 (Office)
dacklie@CSM.edu

Marianne Stevens, Ph.D., witness to email communications, Feb 23, ~~2106~~
[2016]

President, College of St. Mary
7000 Mercy Road
Omaha, NE 68106
402 399 2400
mstevens@csm.edu

Jeannie Nickels, NDE, witness to request for Data, Research & Evaluation
Nebraska Department of Education
301 Centennial Mall South
PO Box 94987
Lincoln, NE 68509-4987
Phone 402.471.2288
jeannie.nickels@nebraska.gov

Denise Schuyler, witness to email NDE Personnel Report 15-16, Aug 8, 2016
Nebraska Department of Education
301 Centennial Mall South
PO Box 94987
Lincoln, NE 68509-4987
Phone 402.471.1914
denise.schuyler@nebraska.gov

Denise Fisher, witness to email NDE Personnel Report 2015-16, Aug 8, 2016
Nebraska Department of Education
301 Centennial Mall South
PO Box 94987
Lincoln, NE 68509-4987
Phone 402.471 5020
denise.fisher@nebraska.gov **[removed bold]**

Dr. Matt Blomstedt, witness to email communications, August 11, 2016
Commissioner of Education
Nebraska Department of Education
301 Centennial Mall South
PO Box 94987
Lincoln, NE 68509-4987
Phone 402.471 5020
matt.blomstedt@nebraska.gov

Brian Halstead, JD, witness to email communications, August 11, 2016
Nebraska Department of Education
301 Centennial Mall South
PO Box 94987
Lincoln, NE 68509-4987
Phone 402.471 0732

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brian.halstead@nebraska.gov

Patrick Slattery, Ed.D. witness to email communication, Jan 18, 2016
Superintendent, Catholic Archdiocese of Omaha Schools
Catholic Schools Office
Mercy Hall
3300 North 60th Street
Omaha, NE 68104-3402
Phone: 402.557.5600
Fax 402 827 3792
pjsslattery@archomaha.org

Mary Laustrup, witness to email communications, Jul 30, Aug 8, 2016
Investigator
Nebraska Equal Opportunity Commission
1313 Farnam on the Mall
Omaha, NE 68102-1863
Phone 402 595 2059
Fax 402 595 1205
mary.laustrup@nebraska.gov

Rhonda Claxton Pittman, witness to email communications, Jul 6, 30, Aug 8, 2016
Investigator
Nebraska Equal Opportunity Commission
1313 Farnam on the Mall
Omaha, NE 68102-1863
Phone 402 595 2028
Fax 402 595 1205
rhonda.pittman@nebraska.gov

- 3) Papers provided to indicate that MJ Sullivan and Barbara Brundo have previously met in NEOC prior to this charge:
- Evidence of letter to MJ Sullivan, addressing allegations of Brundo vs. St Thomas More School, Oct 12, 2012
 - Evidence of letter to MJ Sullivan, addressing allegations of Brundo vs. St. Wenceslaus Church of Omaha, Oct 13-17, 2012
 - Evidence of letter to MJ Sullivan, addressing allegations of Brundo vs. Fremont Public Schools, Fremont NE, Oct 13-15, 2012
 - Evidence of letter to MJ Sullivan, addressing allegations of Brundo vs. St. Stanislaus, Nov 5, 2012
 - Evidence of letter to MJ Sullivan, addressing allegations of Brundo vs. Christ the King Catholic School, November 10-15, 2012
- 4) Other related and recent complaints were investigated by Mary Laustrup and Lance Knapp:
- Evidence of letter to Mary Laustrup, addressing allegations of Brundo vs. St. Stephen Church of Omaha, October 25, - Nov 3, 2012
 - Evidence of letter to Mary Laustrup, addressing allegations of Brundo vs. St. Bernard Church of Benson

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- Evidence of letter to Lance Knapp, addressing allegations of Brundo vs. St. Patrick's Catholic School, **Elkhorn** Sept 13 – Oct 5, 2012
- Evidence of letter to Lance Knapp addressing allegations of Brundo vs. All Saints Catholic School, Omaha, NE Oct 9-12, 2012
- Lance Knapp, et al vs. Karal Hasani Efi Battle-El; Freedom of Information Act

5) Documents indicating the effort to work independently, curtailed;

Constitution, Article I Sec. 8 Intellectual Property Clause -: To promote the Progress of Science and useful Arts, by securing for limited Times to Authors and Inventors the exclusive Right to their respective Writings and Discoveries;]:

- BOOK BINGO TM application denied with lawyer [2001] and pro se [2008]]
- Effort to purchase books denied yet website states that Recorded Books Inc. is a provider to individual; March 28, 2017
- All materials provided at no cost to a school with Fair Use Agreement discontinued use when professional name added to product: Dr. Barbara Brundo's BOOK BINGO TM

Constitution, Article [V] (Amendment 5 - Rights of Persons)

- Lost opportunity to develop parent's property; failure to resolve employment disputes and/or right to work denied. My deceased Mother told me on the last **[private]** visit I ever had with her: **[Oct 26, 2010 at Cheesecake Factory]**, that she and my father were told that they had to sign papers or they would be subject to a lawsuit if a trespasser was injured. Parents had a right to police protection, and other denied rights.
- On October 28, 2010, Joe Matejka, son -in law, sent an email to "Mrs. Mrzlak" and Terri, regarding "the completion of the clearing of the former motel land, I am ending my temporary involvement in the R and T, Corporation property. All decisions and actions should now be the responsibility of Mrs. Mrzlak...." "Margaret and I are now bowing out of any future involvement relating to R&T. The future leadership is in place."
- Joe Matejka earlier [on or near 2008] emailed that he heard about Brundo dust up with Christ the King and I had better not interfere, as he had attorneys ready. Since he has suffered a stroke in recent years, I believe it is wrong to approach. He is not capable of correcting the problems. Joe Matejka and Michael Matejka are not the same person [error *de persona*, Black's Law Dictionary, p 583]

Constitution, Article [IV] (Amendment 4 - Search and Seizure)

Most recently, loss of al. **my** rights related to care of aunt [Douglas County Nebraska Probate PR 16-213] when alleged to have taken

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monies wrongfully. Allegation denied. [See Power of Attorney and Last Will and Testament of Suzanne C. Modlin Sept 14, 2010] Sole beneficiary of Will. House sold under jurisdiction of the court due to allegations of self-dealing by Barbara Brundo. Suzanne Modlin's household goods were all in the home. See CISNEROS v. GRAHAM, 294 Neb. 83, July 2016.

6) Registered for UNO Spring 2016 classes for renewal of Nebraska Educator Certificate:

- Difficulty registering; required 10 sealed transcripts, which were previously provided [2006] & discarded. Sealed duplicates provided all but cumulative Creighton transcript.
- Building [Roskens] John Langan entry doors initially found to be locked on first day of class; after walking around building finding all doors locked then back to front, which remained locked, another student arrived and doors were then unlocked.
- Tuition Cost \$2218.30, plus books and resources shared with class
- Completed UNO Spring 2016 requirements; earned 6 credits
- Renewal applications postponed due to allegations by lawyer of aunt and Court appointed Guardian Ad Litem [Kelly Henry Turner], causing loss of right to determine care of aunt with dementia. [See Douglas County Nebraska Probate 16-213]
- The Court was petitioned to allow the niece as POA to dismiss the lawyer; the response was understood to be the case is contested?

7) Intake Interview by Michello Leo and Charge prepared and signed Sept 8, 2016 without number, no copy provided. On September 14, 2016 received copy of charge. In 1998 I was told that I could not have a copy of my complaint at the time of signing; I replied that I would not sign it. I was given a copy.

Miscellaneous documents related to No. I on NEOC Complaint "most recently..." :

A.

- Omaha World Herald ad: Sunday, November 15, 2015, page 4G
- Omaha World Herald ad: Thursday, November 26, 2015 page 8D
- Christ the King School Faculty, printed April 6, 2017 [3 pages]
- Article: *With personalized learning, students plot their own path*, [Online: World-Herald, Nov 25, 2015, Alia Conley staff writer]
- Google pages, Hannah Kupka
- Notes of attempt to contact Hannah Kupka at Christ the King on August 10, 2016

B.

- Previous application to Christ the King [July 28, 2013] for which NEOC Complaint was not filed. Respondent failed to advise attorney representation, which lead attorney to report, "3 year gap".
- Newspaper ad: July 28, 2013
- Catholic Schools Office Ad, Aug 4, 2013
- Email to Chris Segrell, July 28, 2013
- FAX to Catholic Schools Office, Mercy Hall #402 827-3792; 2 pages Mary Our Queen and CTK emails, Aug 4, 2013

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- o Christ the King Faculty, four pages, printed Sept 2, 2013; appears that the successful candidate was John Sullivan.
- o It appears that the position is now held by Ms. Kim Hansen.

C.

- o Previous application to Mary Our Queen [July 28, 2013] for which NEOC Complaint was not filed.
- o Mary Our Queen, Mrs. Lisa A. Nelson, answered my application by indicating that I would not be pursued as a candidate: *"In reviewing your CV, I noticed that you do not have any recent teaching experience. For this reason, Mary Our Queen will not be pursuing you as a candidate."* Emails from July 28, 2013 through August 8, 2013.
- o USPS Application sent 7/31/2013, delivered Aug 1, 2013:
Letter,
CV edited July 2013
Letter from Sr. Patricia Mulcahey, Former Superintendent
Univ of Southern Calif Confidential File [copy from 8th Circuit]
Creighton Univ Confidential File [copy form 8th Circuit]
Transcripts: Union College, UNO, Harmoney Letter, CU [March 2006, 2 pgs.], W Los Angeles, Cal State LA, Notre Dame Institute [Arlington Virginia], UNL, Chadron, UTEP and USC [4 pages]
Creighton failed to provide undergraduate transcript.
Credentials: California Administrative and Teaching
Nebraska, professional
- o Bishop Accountability.org, August 14, 2013: ALLEGATIONS former Brother Francis Dominic now known as Anthony Salamone; same person may work at Methodist Hospital, Mary Our Queen Church panel, etc.

Same person most likely [Anthony Salamone, laicized, was the candidate for Christ the King Religious Education Director; reference check call was made from office of Rev. Robert J. Gass with Barbara Brundo present, phone on speaker to Franciscan monastery, Steubenville Ohio. Response: No longer with Franciscans, allegation of pedophilia, do not know whereabouts.

D.

Regarding No. II on Complaint:

- a. CTK Chris Segrell is a male as evidenced in Omaha World Herald on February 25, 2017 with St. Bernard teacher awarded \$2500.
- b. Barbara Brundo again expressed interest on January 13, 2016 at the same time registering for renewal classes on Univ of Nebraska, Omaha. [See 1A]
- c. At this time, Douglas County Probate Court PR 16-213 has denied me all rights with my paternal Aunt Suzanne C. Modlin, in retaliation for my filings with the NEOC, EEOC, U.S. District Court, Omaha, Eighth Circuit Court of Appeals and the Supreme Court of the United States.

E.

Regarding No. III on Complaint:

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- d. Hannah Kupka, Westside did not have Nebraska teaching credential until on or near ad/position posting: Nov 17, 2015. [See 1B]

F.

EEOC, James R. Neely, Director was previously involved in filings by Barbara Brundo. [page 2 of charge, U.S. Equal Employment Opportunity Commission]

G.

Information on Charges of Discrimination [page 3] – Regulations require preserving documents.

- Did the NEOC do that, i.e. were comments just threats: See Sec 1602.14. Termination vs. without prejudice court order. There has never been a resolution of any complaint.
- Notice of Non-Retaliation Requirement: unlawful.... against present or former employee, (Barbara Brundo worked for Christ the King for six years.) because they have opposed any practice made an unlawful employment practice by the statutes or made a charge, testified, assisted or participated.”
- Section 503(b) ADA prohibits coercion, intimidation, threats: Barbara Brundo has experienced coercion, intimidation and threats.
- **Persons filing charges of discrimination are advised of these Non-Retaliation Requirements and are instructed to notify EEOC if any attempt at retaliation is made. Please note that the Civil Rights Act of 1991 provides substantial additional monetary provisions to remedy instances of retaliation or other discrimination, including, for example, to remedy the emotional harm caused by on-the-job harassment.**

SUCCESSFUL RETALIATION TOOK PLACE IN THE DOUGLAS COUNTY NEBRASKA PROBATE COURT BEGINNING FEBRUARY 2016: PR 16-213. BARBARA BRUNDO WAS DENIED INHERITANCE AND ALL LEGAL RIGHTS IN BEHALF OF SUZANNE C. MODLIN. Manifest constitutional error. Manifest error.

Omaha Nebraska, Douglas County Court, has experienced the trial for horrific murders by a physician resident [Garcia] at Creighton University due to employment disputes.

Barbara Brundo patiently and with almost consistent composure addressed the proper entities for resolution over a period of many years, exceeding twenty years. To this point, the Court has penalized her and repeated Orders documented a “personality” problem. Complainant denies.

The exception is the Supreme Court of the United States which accepted pro se work: ...“petition for a writ of certiorari in the above entitled case was filed on January 29, 2014 and placed on the docket June 12, 2014 as No. 13-1486.” October 6, 2014 petition denied.

Earlier, the Clerk asked that I sign papers, however the question of sanctions was not answered. Before going back to the Clerk the brief was updated with ten more respondents. The questions of merit were answered in HOSANNA-TABOR EVANGELICAL LUTHERAN CHURCH AND SCHOOL, PETITIONER v.

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**EQUAL EMPLOYMENT OPPORTUNITY COMMISSION ET AL. 565 U.S. ____
(2012)**

The Briefs were sent to defendants as certified to the Court. Unfortunately, it was understood that the Rules of the Supreme Court had changed regarding pro se representation, in addition to a clerical error on Barbara Brundo's part. Forms [Waivers] to the defendant attorneys from the Clerk of the Court were not forwarded, in error.

[clerical error; .."A court can correct a clerical error at any time, even after judgment has been entered. *Black's Law Dictionary*, pg. 582.

In addition, my mother died and was buried on June 5, 2014 and my aunt suffering dementia was requiring more assistance in the quality of her care at her assisted living location, Prairie Meadows, Omaha.

When is harassment illegal? [<http://oclaborlaw.com/labor5.pdf>]

Contrary to popular belief, it is not illegal for a supervisor to harass an employee simply because he or she doesn't like the employee's work or doesn't like the employee as an individual. Harassment is illegal only if it is based on some protected characteristic of the employee, such as his or her age, race, national origin, sex, religion or disability.

In addition, harassment must be severe or pervasive in order to violate the law. Courts have held that the government cannot make American workplaces pristine, but may ensure only that they are not hostile and abusive to an employee because the employee is a member of a protected class. Therefore, isolated or occasional use of racial or ethnic slurs, or sporadic dirty jokes, while offensive, will not violate the law. On the other hand, one incident of harassment, if it is severe enough, may be enough to violate the law. An example might be a sexual assault or a beating by coworkers. Likewise, harassment which is continual or which pervades the work environment is actionable. Such behavior includes constant dirty jokes or comments, repeated unwelcome passes, anti-Semitic or racist comments, or a workplace decorated with pornographic posters. Finally, the harassing behavior must be offensive to the reasonable person and to the employee. Behavior which offends a highly sensitive employee, but which would not offend a reasonable person in the same situation, would not violate the law. Likewise, behavior that might offend a reasonable person, but that clearly did not offend the employee, will not create a right for damages. Some courts define a reasonable person as an average employee in same the protected category as the employee, for example, a reasonable female employee or a reasonable Hispanic employee; other courts consider the reaction of a generic reasonable person. In determining whether the employee was offended personally, a court or jury will consider whether the employee willingly participated in the conduct, and whether he or she used reasonably available avenues of complaint to protest the conduct.

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**8) RE: PREVIOUS NEOC/EEOC CHARGES FILED AGAINST CHRIST THE
KING CATHOLIC CHURCH AND SCHOOL AND OTHER PUBLIC,**

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**PRIVATE OR PAROCHIAL ENTITIES: NEOC FILE COPIES HAVE
BEEN RETAINED BY BARBARA BRUNDO**

1. March 18, 1998 NEB 2-97/98-3-25877-R
Archdiocese of Omaha & Christ the King
2. August 4, 2000 NEB 2-00/01-8-29201-R;
NEB 2-00/01-8-29202-R;
32EA0 0933
All Saints Catholic School
3. August 4, 2000 NEB 2-00/01-8-29167-R;
NEB 2-00/01-8-29168-R;
32E A0 0924
Archdiocese of Omaha & Christ the King
4. August 4, 2000 NEB 2-00/01-8-29169-R;
NEB 2-00/01-8-29170-R;
32E0 0925
Christ the King
5. August 4, 2000 NEB 2-00/01-8-29179-R;
NEB 2-00/01-8-29180-R;
32E AO 0930
Daniel Gross High School
6. August 4, 2000 NEB 2-00/01-8-29173-R;
NEB 2-00/01-8-29174-R;
32E A0 0927
Our Lady of Lourdes School
7. August 4, 2000 NEB 2-00/01-8-29175-R;
NEB 2-00/01-8-29176-R;
32E A0 0928
St. Margaret Mary School
8. August 4, 2000 NEB 2-00/01-8-29203-R;
NEB 2-00/01-8-29204-R;
32E A0 0934
St. Matthew Catholic School
9. August 4, 2000 NEB 2-00/01-8-29199-R;
NEB 2-00/01-8-29200-R;
32E A0 0932
St. Robert Bellarmine

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10. August 4, 2000 NEB 2-00/01-8-29171-R;
 NEB 2-00/01-8-29172-R;
 32EA 0 0926
 St. Vincent de Paul

11. August 4, 2000 NEB 2-00/01-8-29205-R;
 NEB 2-00/01-8-29206-R;
 32E A0 0935
 Westside Foundation

12. August 4, 2000 NEB 2-00/01-8-29197-R;
 NEB 2-00/01-8-29198-R;
 32E A0 0931
 Westside Community Schools

August 4, 2000 NEB 2-00/01-8-29177-R
 NEB 2-00/01-8-29178-R
 32E AO 0929
 Brundo v. Creighton University, Department of Education

Withdrawn August 21, 2000, prior to NEOC investigation, therefore copy of NEOC file not permitted. University self-investigation was understood as promised by Fr. Schlegel in a personal meeting but later not recalled by Dr. Charlie Dougherty. Behavior was repeated.

Creighton Prep also boldly retaliated when John Naatz [principal] stood at the doorway at the end of a theology teacher position interview and stated there was an investigation. Others were present for the interview. No separate charge filed; there are two separate Boards for the two Jesuit schools. Later it was learned that John P. Schlegel was personally involved in termination of Terence German, SJ [whistleblower] at Marquette Univ. At issue was professional misbehavior that would be criminal if true.

13. November 27, 2000 NEB 2-00/01-11-29528-R;
 NEB 2-00/01-11-29529-R;
 32E A1 0119
 Catholic Academy Reasonable Cause

14. November 27, 2000 NEB 2-00/0-11-29530-R;
 NEB 2-00/0-11-29531-R;
 32E A1 0120
 St. Joan of Arc Catholic School

15. July 20, 2001 [July 10th] NEB 2-01/02-7-30422-R;
 NEB 2-01/02-7-30423-R;
 32E A1 0781
 Christ the King

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16. July 20, 2001 NEB 2-01/02-7-30420-R;
NEB 2-01/02-7-30421-R;
32E A1 0780
Omaha 200/Bright Horizons Family Solutions
17. July 20, 2001 NEB 2-01/02-7-30418-R;
NEB 2-01/02-7-30419-R;
32E A1 0779
Duchesne Academy
18. December 17, 2001 NEB 2-01/02-12-31097-R;
NEB 2-01/02-12-31098-R;
32EA200231
Christ the King Catholic School
19. June 21, 2002 NEB 2-01/02-6-31682-R;
[June 14, 2002?] NEB 2-01/02-6-31683-R;
32EA200756
Christ the King Catholic School

20. **NUMEROUS OTHERS**

U.S. District No. 8:08CV477 [8th Circuit No. 09-2823]
Dr. Barbara Brundo vs. Christ the King School of Omaha
NEB 2-06/07-3-37834-R, Age
NEB 2-06/07-3-37835-R, Sex and Retaliation
Position of 5-8 Grade Language Arts

AMENDED CHARGE by NEOC Directive (December 19, 2007)
Dr. Barbara Brundo vs. Christ the King Church of Omaha
NEB 2-06/07-3-37834-R, Age
NEB 2-06/07-3-37835-R, Sex and Retaliation

U.S. District No. 8:08CV209 [8th Circuit No. 09-3084]
Brundo vs. Nebraska Catholic Conference
NEB 2-06/07-3-37832-R, Age EEOC 32E-2007-00375
NEB 2-06/07-3-37833-R, Sex/Retaliation EEOC 32E-2007-00375
Position of Associate Director of Education Issues

U.S. District No. 8:10CV00056 (2010) [8th Circuit No. 10-1328]
Brundo vs. Christ the King
NEB 2-08/09-12-39683-R
NEB 2/08/09-12-39684-R) (EEOC 32E-2009-00307)
Position of Grade Five Grade School Teacher

U.S. District Court, NE, No. 4:09-ps-03001(2010) Sealed 7/15/2009

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U.S. District No. 8:09CV213-LSC [8th Circuit No. 10-1712]
Barbara Brundo, Ed.D. vs. Christ the King Catholic School
Positions of Social Studies and/or Library Media
Specialist; Second Right to Suit Position of Religion
Teacher

UNITED STATES DISTRICT COURT, NEBRASKA CASES:

Brundo v. All Saints Catholic School; Case No. 8:01CV517
Position applied for: Librarian

Brundo v. Archdiocese Of Omaha/Christ The King, Case No. 8:01CV587
Position applied for: Superintendent

Brundo v. Catholic Academy, Omaha, Case No. 8:01CV622
Position applied for: Third Grade Teacher

Brundo v. Christ The King Catholic School/Church, Case No. 8:02CV216
Position applied for: Principal (Teacher [Michael Florea] cited for sexual misconduct at St. Vincent de Paul was employed at Christ the King in 1993-1994. His behavior at CTK is unknown at this time. It was said that he could not discipline students. However the son of the Complainant was a student at CTK during the time period involved; Barbara Brundo returned to Christ the King as Religious Education Coordinator for 1994-1995.

Brundo v. Daniel J. Gross Catholic High School, Case No. 4:01CV542
Position applied for: Theology teacher

Brundo v. Our Lady of Lourdes Catholic Grade School/Church, Case No. 4:01CV543
Position applied for: Kindergarten teacher

Brundo v. St. Joan Of Arc/St. Gerald Catholic School/Church, Case No. 4:01CV585
Position applied for: 7th & 8th Grade Religion and Language Arts

Brundo v. St. Margaret Mary, Case No. 8:01CV505
Position applied for: Computer teacher

Brundo v. St. Matthew The Evangelist Catholic School/Church, Case No. 8:01CV586
Position applied for: Principal

Brundo v. St. Robert Bellarmine School/Church, Case No. 8:01CV502
Position applied for: 1) Principal 2) Religion teacher

Brundo v. St. Vincent De Paul Catholic School, Case No. 8:01CV588
Position applied for: Principal. Since the failure to hire incident, St. Vincent de Paul had a teacher [see above] removed for illegal behavior, approximately twelve (12) students away from school.

Brundo v. Christ the King, Case No. 8:04 v 209 Number assigned similar to Neb Catholic Conference 8:08cv209
Position applied for: Any of the following: 1st grade, 3rd, 4th, 5th grade, 6-8 Language Arts [hired two], teacher assistant [hired three]

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Brundo v. Westside Foundation, DBA Prairie Lane Day Care

Case No. 4:01CV320; See also 8:01CV320

Position applied for: Child care assistant; no full time position available although advertised; offer part time position requiring a commitment for the school term (September –June).

Brundo v. Westside Community Schools (District #66),

Case No. 4:01CV544; See also 8:01CV544

Positions applied for: Numerous; Instructor, assistant principal, principal, library media, 8th grade English, etc.

Defendant attorney, Margaret Coyle Hershiser was on the hiring committee of St. Vincent de Paul, cited above. Her brother-in-law (John Naatz) is principal of Creighton Prep, where Plaintiff served as a UNO Student Library Intern in 1997-98 and was given a student [creative writing, fact or fiction?] paper that was suggestive of abuse and illegal behavior. Plaintiff was later, an unsuccessful applicant for theology position. Incident report: President Fr. Hotz, teacher, lawyer.

Mr. Allan E. Daubman	Ms. Margaret Coyle Hershiser
Green, Pickens Law Firm	Koley, Jessen Law Firm
444 Regency Parkway Drive	1125 South 103 rd Street
Suite 100	Suite 800, One Pacific Place
Omaha, NE 68114	Omaha, NE 68124
402 393 7400	402 390 9500
FAX 402 393 8565	FAX 402 390 9005

Brundo v. Duchesne Academy Of The Sacred Heart,

Case No. 8:02CV214

Position applied for: Theology teacher; earlier contacted by Mrs. Fran Root to apply for Head of School. Since incident of failure to hire, the school had a male teacher removed for misconduct with a student through the use of computers. Plaintiff was not been permitted to copy the NEOC files. Mary Buglewicz Duffy was principal at time of one incident. Daughter is assigned NEOC cases in Office of the Attorney General. [Conflict of interest]

Mr. Chris Hedican
Baird Holm LLP
1500 Woodmen Tower
1700 Farnam Street
Omaha, Nebraska 68102-2068
Tel: 402.344.0500
Fax: 402.344.0588

Brundo v. Bright Horizons Family Solutions,

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DBA *Omaha 2000 Early Child Care Center @College of St. Mary*,
Case No. 8:02CV299

Position applied for: Infant childcare for four children of the same age with support provided for the preparation of food, cleaning of facility and administrative details. Potential opportunity to teach at the College of St. Mary offered in interview. Center had a staff shortage at time of application. Son-in-law encouraged application, *granddaughter was enrolled*]. Since Defendant had an incident of sexual abuse involving a child, with a child of an employee; there is a related report (same child) at another location. (*Omaha World Herald, Midlands, Wednesday, July20, 2005, Boy, 13, accused of assaults, pg. 5B*)

Mr. Christopher Hoyme
Berens and Tate, PC, LLO
10050 Regency Circle, Suite 400
Omaha, Nebraska 68114
Phone: 402 / 391-1991
Fax: 402 / 391-7363

SUMMARY OF COMPLAINTS

CHRIST THE KING SCHOOL

NEBRASKA EQUAL OPPORTUNITY COMMISSION and

THE UNITED STATES EQUAL OPPORTUNITY COMMISSION

1. March 18, 1998

Neb 2-97/98-3-25877-R
EEOC 32E98 0815
Position sought: Principal

2. August 4, 2000 (CTK and Archdiocese)

Neb 2-00/01-8-29167-R AGE
Neb 2-00/01-8-29168-R
EEOC 32E A0 0924
Superintendent of Catholic Schools

3. August 4, 2000

Neb 2-00/01-8-29169-R AGE
Neb 2-00/01-8-29170-R
EEOC 32 E A0 0925 Number ON CHARGE Deborah Baker
EEOC 32E A0 1925 Number ON DETERMINATION Mel Clancy
Position sought: Library Media- 1998
Position sought: Library Media- 1999
Position sought: Long -Term Substitute Computer Lab

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4. July 20, 2001

Neb 2-01/02-7-30422-R AGE RETALIATION
Neb 2-01/02-7-30423-R FAILURE TO HIRE RETALIATION
EEOC 32E A1 0781
Position sought: Principal

5. December 17, 2001

Neb 2-01/02-12-31097-R AGE RETALIATION
Reasonable Cause
Neb 2-01/02-12-31098-R FAILURE TO HIRE RETALIATION
Reasonable Cause
EEOC 32E A2 00 231
Position sought: Technology teacher

6. June 21, 2002

Neb 2-01/02-6-31682-R AGE RETALIATION
Neb 2-01/02-6-31683-R FAILURE TO HIRE RETALIATION
EEOC 32EA200756
Position sought: 1) First, 2) Third, 3) Fourth, 4) Fifth,
5) Sixth-Eighth Language Arts, 7) Teacher Assistant
(OBJECT TO LETTER ABOUT Alcohol in the file unless an
inference about another person (Board President signing
contract))

7. March 20, 2007; Amended December 19, 2007

Neb 2-06/07-3-37834-R AGE RETALIATION
Neb 2-06/07-3-37835-R FAILURE TO HIRE RETALIATION
EEOC 32E-2007-00376
Position sought: Language Arts Teacher

8. December 19, 2007

Neb 2-07/08-12-38636-R AGE RETALIATION
Neb 2-07/08-12-38637-R FAILURE TO HIRE RETALIATION
EEOC 32E 2008-00204
Position sought: Religion Teacher

9. December 19, 2007

Neb 2-07/08-12-38638-R AGE RETALIATION
Neb 2-07/08-12-38639-R FAILURE TO HIRE RETALIATION
EEOC 32E-2008-00205
Position sought: 1) Library Media 2) Social Studies

10. December 11, 2008

NEB 2-08/09-12-39683-R
NEB 2/08/09-12-39684-R)
(EEOC 32E-2009-00307)
Position sought: Grade Five Classroom Teacher

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11. March 7, 2012

NEB 2-11/12-4-42912-RD;

EEOC/HUD 32E-2012-00404

Position sought: **6th Grade Teacher, Science, Social Studies, Religion**

There are more...**Columbus, 2008**, Westside and Fremont, again 2013, **2014**, etc.

"In determining whether the employee was offended personally, a court or jury will consider whether the employee willingly participated in the conduct, and whether he or she used reasonably available avenues of complaint to protest the conduct."

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9) Conflict of Interest – When applicable – Avoid appearance of impropriety

Under state law, public employees are barred from taking official actions or making official decisions that could benefit or harm themselves financially.

The law also prohibits actions or decisions that could benefit or harm the employee's immediate family or any business with which the employee is associated. [Omaha World Herald, March 17, 2017, p. 1A, 2A]

- Does the fact that **Briana Siobhan E. Duffy**, daughter of Mary Buglewicz Duffy represented the Attorney General in the Office of the NEOC create a conflict of interest? Mary Duffy was the principal at Christ the King while Barbara Brundo was Coordinator of Religious Education.
- John Paul Sullivan was hired at Christ the King. I do not know his relationships to others in leadership positions in various city and state entities such as NEOC as well as private corporations. There were three *John Sullivans* listed in NDE teacher certification.
- Barbara Albers was the Executive Director of the NEOC. I do not know her relationships to others in leadership positions or law offices of school offices. Meghan Albers and Hannah Kupka have coaching assignment at Westside. Albers Communication's attorney is Pat Sullivan. Virginia Albers was former member of parents' law firm at time of incident.
- Barbara Brundo withdrew a charge at Creighton University due to related student attendance and employee status. **That decision was based on a belief that addressing the issues with the new President, John Schlegel, would resolve the complaint.** Sally Spencer former Certification Officer documented Creighton University affiliation with all subpoenas for Credential Files for all Catholic Schools alleged to practice unfair hiring. Creighton is party to Douglas County Nebraska Probate 16-213. Geoffrey Lieben was former member of parents' law firm at time of occurrence.

It was later learned that Father John P. Schlegel was involved in the termination a priest, Terence German, at Marquette University. The

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priest documented his whistleblower behavior regarding exploiting young seminarians in Supreme Court of the State of New York, County of New York. Index No. 119296-1993 was filed on July 30, 1993, due to "violation of the vow of poverty and defendants' toleration of sexual improprieties in violation to the vow of chastity..." p.7; "sexual improprieties against under-age males, trainee Jesuits..." p.8

- 10) Equal Pay vs. No Professional Pay, No Salary since 1998; professionals commensurate with the ability of Barbara Brundo, Ed.D and their salaries. Equal Pay Act [Amendment to Fair Labor Standards Act] does not cover unfair hiring resulting in unemployment.

Dr. Jane Stavem, Candidate for OPS Superintendent currently earns \$218,274 in Lincoln Public Schools. [*Omaha World Herald*, March 4, 2017]

Lt. Gov. Kim Robak, Lobbyist, firm earned \$1,162,916 in 2016; [*Omaha World Herald*, Feb 28, 2017] [Recall reading \$125,000 around 1998]

Dr. Khalid Mumin, the superintendent of the Reading School District in Reading, Pennsylvania; Mumin's current contract provides a base salary of \$185,000. He said compensation has not been part of his discussions with Omaha Public Schools this early in the selection process. [Online]

Dr. Paul Gausman, OPS Superintendent candidate is the superintendent of the Sioux City Community School District in Sioux City, Iowa: Salary \$235,904. He also received a 3 percent increase in the annual contribution the district makes to a tax sheltered retirement annuity of his choice, increasing that total to \$33,306 per year. [Online]

Dr. Vickie Murillo, Council Bluffs Iowa next school superintendent, \$225,000 base salary, 5 % annuity and a standard benefits package. [*Omaha World Herald*, April 12, 2017]

OPS Superintendent Mark Evans' base pay for the 2016-17 school year is \$288,360. Counting benefits, an annuity and a car allowance, the total cost of his compensation package is \$395,077. [Online]

Dr. Patrick Slattery, Superintendent of Omaha Catholic Schools, has just taken a position with Xaverian Brothers Sponsored School, 4409 Frederick Ave, Baltimore, MD. He begins on July 10, 2017. His salaries in Omaha and in Maryland have not been announced. Superintendent of Schools, Archdiocese of Omaha position posted April 3, 2017. No salary information.

- 11) <http://constitutions.com>

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[Constitution, **Article I**, Sec. 8: To promote the Progress of Science and useful Arts, by securing for limited Times to Authors and Inventors the exclusive Right to their respective Writings and Discoveries;]:

[Constitution, **Article III** (Article 3 - Judicial) Sec 2; 2: In all Cases affecting ambassadors, other public Ministers and Consuls, and those in which a State shall be Party, the Supreme Court shall have original Jurisdiction.] [NEOC, EEOC, Neb Dept of Educ]

Constitution **Article VI** (Article 6 - Prior Debts, National Supremacy, Oaths of Office) 3: The Senators and Representatives before mentioned, and the Members of the several State Legislatures, and all executive and judicial Officers, both of the United States and of the several States, shall be bound by Oath or Affirmation, to support this Constitution; but no religious Test shall ever be required as a Qualification to any Office or public Trust under the United States.

Article [I] (Amendment 1 - Freedom of expression and religion) ¹³
 Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.

Article [IV] (Amendment 4 - Search and Seizure)
 The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

Article [V] (Amendment 5 - Rights of Persons)
 No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation. Barbara Brundo by Court Order prepared documents without remuneration contrary to POA prepared by Aunt's attorney David P. Wilson.

Article [VII] (Amendment 7 - Civil Trials)
 In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise re-examined in any Court of the United States, than according to the rules of the common law.

Article XIV (Amendment 14 - Rights Guaranteed: Privileges and Immunities of Citizenship, Due Process, and Equal Protection)
 1: All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State

deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

12) [<http://www.un.org/en/universal-declaration-human-rights/>]

The Universal Declaration of Human Rights - The Universal Declaration of Human Rights (UDHR) is a milestone document in the history of human rights. Drafted by representatives with different legal and cultural backgrounds from all regions of the world, the Declaration was proclaimed by the United Nations General Assembly in Paris on 10 December 1948 (General Assembly resolution 217 A) as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental human rights to be universally protected and it has been translated into over 500 languages.

Article 23.

- (1) Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
- (2) Everyone, without any discrimination, has the right to equal pay for equal work.
- (3) Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
- (4) Everyone has the right to form and to join trade unions for the protection of his interests.

13) <http://www.bishop-accountability.org/Whistleblowers/> This should be considered an attempt to strengthen the Church laity, not something to "cover up."

US Church Insiders Who Have Blown the Whistle on Alleged Child Sexual Abuse and Cover-Up

The burden of disclosing sexual abuse by Catholic clerics and its cover-up by religious leaders has fallen almost completely on victims. Most church insiders who have witnessed misconduct have chosen not to report it. Fortunately, there have been remarkable exceptions. BishopAccountability.org is pleased to present the first database of church whistleblowers - priests, men and women religious, and other church employees and volunteers who reported colleagues to church or civil authorities and fought their superiors' concealment of abuse. We have defined "whistleblower" broadly: our table includes both those who spoke up internally and those who went outside the church. Many of the individuals profiled below have experienced retaliation and grief in some form - defamation, job loss, career derailment, ostracization, pressure by superiors to admit to mental illness, and in at least one case, suicide. By documenting this overlooked aspect of the crisis, we hope to raise awareness that whistleblowers must be protected in both the church and civil society. We hope too that these stories will help still-silent witnesses find the courage to come forward.

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In 2012, in the early stages of our whistleblower research, we brought together ten of the brave individuals pictured below. After months of planning and conversation, they launched Catholic Whistleblowers, the first group of priests and nuns dedicated to helping Catholic church insiders who have witnessed wrongdoing. See "[Church Whistle-Blowers Join Forces on Abuse](#)," by Laurie Goodstein, The New York Times, May 20, 2013.

Note: On December 18, 2013, we added lay whistleblowers to our database of clergy and religious whistleblowers. While we always intended to document the role of lay as well as ordained whistleblowers, the stunning revelations in October 2013 regarding the archdiocese of St. Paul and Minneapolis by former canonical chancellor [Jennifer Haselberger](#) made this expansion urgent.

We will be adding steadily to the lay and clergy databases, as well as to our [international list](#). To suggest names in any of these categories, please [email us](#)

Two publications, [Violated, Exposing Rape at Baylor University Amid College Football's Sexual Assault Crisis](#), by Paula Lavigne and Mark Schlabach © 2017 and [Renegade Priest of the Northern Cheyenne, The Life and Work of Father Emmett Hoffman 1926](#), © 2003, evidence a pattern of silence or neglect and/or retaliation for incidences. There are Nebraska connections cited in both books.

CONCLUSION

Why is it that one, who advocates for the truth vs. fraud or misrepresentation, is denied employment under the protection of separation of church and state? Is it true that no one likes a tattletale? until it is their bank account used for embezzlement? Or their school lacking professional behavior toward students or respect for rules and regulations?

While the following makes no mention of retaliation discrimination, the sentence of the last paragraph makes a point.

When is harassment illegal? [<http://oclaborlaw.com/labor5.pdf>]

Contrary to popular belief, it is not illegal for a supervisor to harass an employee simply because he or she doesn't like the employee's work or doesn't like the employee as an individual. Harassment is illegal only if it is based on some protected characteristic of the employee, such as his or her age, race, national origin, sex, religion or disability.

In addition, harassment must be severe or pervasive in order to violate the law. Courts have held that the government cannot make American workplaces pristine, but may ensure only that they are not hostile and abusive to an employee because the employee is a member of a protected class. Therefore, isolated or occasional use of racial or ethnic slurs, or sporadic dirty jokes, while offensive, will not violate the law. On the other hand, one incident of harassment, if it is severe enough, may be enough to violate the law. An example might be a sexual assault or a beating by coworkers. Likewise, harassment which is continual or which pervades the work environment is actionable. Such behavior includes constant dirty jokes or comments, repeated unwelcome passes, anti-Semitic or racist comments, or a workplace decorated with pornographic posters. Finally, the harassing behavior must be offensive to the reasonable person and to the employee. Behavior which offends a highly sensitive employee, but which would not offend a

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reasonable person in the same situation, would not violate the law. Likewise, behavior that might offend a reasonable person, but that clearly did not offend the employee, will not create a right for damages. Some courts define a reasonable person as an average employee in same the protected category as the employee, for example, a reasonable female employee or a reasonable Hispanic employee; other courts consider the reaction of a generic reasonable person. In determining whether the employee was offended personally, a court or jury will consider whether the employee willingly participated in the conduct, and whether he or she used reasonably available avenues of complaint to protest the conduct.

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"and whether he or she used reasonably available avenues of complaint to protest the conduct." The NEOC was understood to serve as a screening organization before one is permitted to file a complaint in court. That may not always be true any longer.

[<https://www.eeoc.gov/laws/types/retaliation.cfm>]: The EEO laws prohibit punishing job applicants or employees for asserting their rights to be free from employment discrimination including harassment. Asserting these EEO rights is called "protected activity," and it can take many forms. For example, it is unlawful to retaliate against applicants or employees for:

- filing or being a witness in an EEO charge, complaint, investigation, or lawsuit

Participating in a complaint process is protected from retaliation under all circumstances. One can consider two thoughts about knowledge of previous filing of complaints, one is that the hiring committee will be proactive and fair, the other is the previous complaints signal a performance problem that in reality is not substantiated but the applicant is refused consideration as a trouble maker.

[https://www.eeoc.gov/laws/types/retaliation_considerations.cfm]

Recently in my own words,

No I was "not renewed" in 1992 as principal and "not renewed" in 1995 as Religious Education Coordinator. The reasons were never articulated other than a "variety of reasons" but I did have a lawyer help me screen applicants for teaching by creating a new employee application with self-evaluation for allegations of abuse of children, drugs or alcohol. Any other reasons would be pretext or illegal.

I have represented myself submitting briefs to the United State Supreme Court.a clerk coached me a bit, i.e. requiring word-processing with specific formatting.

I celebrate Hosanna-Tabor v. EEOC as being selected instead of mine as I was updating and getting ready to clarify whether or not I would be subject to sanctions... I already had been \$18,000. In fact my last words to my father were, I have to go to the bank and get \$20,000 [twenty] for the Holy Catholic Church. Well that becomes a story of its own, but I paid it and the Church never reimbursed after Hosanna.

The gist of Hosanna v. EEOC is that religious education [organizations] can hire/fire

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who ever they want [ministerial exception] however the Catholic Church or any other for that matter, may not be protected for criminal violations [covering up pedophiles] or civil violations [contract violations] both of which I alleged during a period of over 15 years in court and many before going to court.

I was substitute teacher for Westside for a few months in 1998 until I decided there were too many new hires half my age. I graduated into grandmother status and have had five grandchildren read all the BOOK BINGO™ selections to about 4th grade and some are working on 7 & 8th [genre with title of their choice] as high school students. That is fine and they could run or assist workshops and have made my life good.

So no I am not working, exception my home full time research; employment law and now elder abuse..... I always say no pay until I get the job done. Twenty years is a long time to wait for a paying job!

But my aunt, who now has dementia and I became great friends, She gifted me her home but in the last months the Judge Suzan Bazis allowed the attorney to sell it and pay two law firms with five lawyers against Barbara Brundo, \$44,000, \$19,000 and \$9,000. After five years of serving her needs Barbara Brundo \$00.00.

Oh, since they also chose to accuse my husband of being unprofessional, he wanted me to get a lawyer. The two were Koukol and Milone, to the tune of \$10,000 with a \$1400+ refund when they decided they did not want to represent me/us. They did help me get time to preserve and copy all her 14 cases of documents accumulated in 5 years. They then asked me to sign a motion to withdraw. I have been working at it every since July 2016..... at my cost of \$2000 so far.

Jerry goes to Creighton one day a week and our daughter works at Creighton in the top admin offices. AND I objected to giving my aunt's \$1 million dollar to them as she told me I was to make all decisions. ...

Otherwise pray for the Church leadership. as a dear former college instructor, in fact my CU Children's Literature teacher, a religious sister, said to me. ".....they hurt the ones who loves it the most."

I will tell you that in 1992, there was an exit interview with the School Board and Finance Committee; I was told by Fr. Robert Gass that after I left the meeting, the comment was "She should be superintendent" He told me "only if your office is in my building."

So was it the motel flood, the pedophile that I discovered while hiring, the debate of Apple vs. IBM computers for the school, questions about what is "day to day" operations vs. board authority; confidentiality of teacher evaluations, [and I now add...a can of beer in lunch placed by a Dad with Board authority], etc. There is still a chance that I will learn the real reason as the persons who wrote the rejection letters are still living and in good health.

God Bless Terrence German, formerly of the Society of Jesus,

The Nebraska State Legislature voted 29-3 on Wednesday April 5, 2017 to give initial approval to a bill that would not only remove the statute of limitations, it would apply only to

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lawsuits filed against individuals, not against institutions or organizations that employed or shielded an abuser. [Omaha World Herald, Thursday April 6, 2017 Section B.] To date, the Courts will not allow individuals to be named in Title VII complaints. It is reasonable to believe that other statute violations that do allow individual responsibility can co-exist with a Title VII violation.

Individuals who are abusers may or may not be clergy or teachers; some insurance policies have exclusions for sexual abuse coverage. By protecting the institutions or organization that employ or shielded an abuser the victim is further injured with loss of monetary damages. [See Forrest T. Jones and Company, Kansas City Missouri to verify.] See also John Jay Study, 2011.

It is now April 2017 and Barbara Brundo has never been compensated for harm since her lost of employment at Christ the King Catholic School, Omaha Nebraska. She remains unemployed for over twenty years. She used reasonably available avenues of complaint to protest the conduct, but the United States District Court found her to be litigious and dismissed her complaints and will not allow further filings without permission. One has to do a lot of work before presenting a complaint only to be refused the right to file. And the cost is not small but was willingly paid for public welfare. Further there is believed to be yet another conflict of interest with the Chief Justice Smith Camp and now deceased parent of Barbara Brundo. The October 31, 1995 letter from Nick Mrzlak to Ms. Laurie Camp, Deputy Attorney General, Lincoln, NE, regarding his business and vandalism. Honorable C. Thomas White referred Nick Mrzlak to Ms. Camp. Mr. John Freudenberg, Office of Attorney General, was unable to locate the answer to the letter.

The Clerk of the United States Supreme Court in a telephone conversation stated the question was answered. That is understood [Hosanna vs. EEOC] to be the "ministerial exception" applied to cases involving religious organizations and employment disputes. So by the fact that the Court heard the Hosanna case evidences that the Brundo like-cases, were not without merit. However if the decision is applied on a case-by-case basis, the decisions about damages are yet to be made.

Christ the King Catholic School benefited from the professional work of Dr. Barbara Brundo and yet by their actions destroyed all efforts on her part for employment in any school and financial compensation of any kind.

Being denied certification rights, and denying the inheritance rights and responsibilities of her paternal aunt is extreme harassment. [Douglas County Nebraska Probate Court 16-213]

Barbara Brundo, Ed.D.
 Email document

California renewal:
 Commission on Teacher Credentialing issued you the following document on 8/24/2017
 Clear Administrative Services Credential
 Document Number: 170185737
 Issuance Date: 08/01/2017
 Expiration Date: 08/01/2022

Barbara Brundo
 12/22/2017

Barbara Brundo, Ed.D.
9827 Bloomfield Drive
Omaha, NE 68114

Denise Lucks, Clerk of Court

Roman L. Hruska Federal Courthouse
111 South 18th Plaza
Suite 1152
Omaha, NE 68102

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